

# EXHIBIT A



**Re: PG&E - Estimation and Stay Relief Motions**

**Julian, Robert** to: David Herman

07/19/2019 06:51 PM

"Paul Zumbro", "Kevin Orsini", "Stephen", "Dumas, Cecily",  
"BMcCallen@willkie.com", "Frank Pitre", "Steve Campora",  
Cc: "MKelly@walkuplawoffice.com", "Khalidoun Baghdadi",  
"DEG@coreylaw.com", "alr@coreylaw.com", "Alison Cordova",  
"Steve Skikos", "Brendan Kunkle", "Morris, Kimberly S."

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David,  
The US Governments response raised the capped trust issue not the UST's paper.  
Thanks.

Robert Julian  
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On Jul 19, 2019, at 3:10 PM, Julian, Robert <[rjulian@bakerlaw.com](mailto:rjulian@bakerlaw.com)> wrote:

David,  
I have checked with the lawyers for the individual plaintiffs who are moving parties with the TCC on the Tubbs Fire relief from stay motion (except one), and counsel for the Ad Hoc Group of Subrogation Claim Holders who joined in the motion.  
The moving parties object to a continuance of the July 24 Tubbs motion, and the Ad Hoc Group joins in the objection, on two independent grounds:  
1. The individual plaintiffs and insurers believe they must obtain relief from stay for the Tubbs preference claims and file their request for the state court to set the preference cases for trial on the existing July 24 schedule because a continuance would unreasonably compress discovery and be inconsistent with the elderly and infirm plaintiffs' rights to preference trials on a speedy basis; and,  
2. The TCC's and the UST's responses to the Ad Hoc Committee of Bondholders' motion to terminate exclusivity, and the Tubbs relief from stay motion, both address the same relief from stay and capped trust issues and are both set for a hearing on July 24, and the parties believe it is best to address those two motions together at the same time.  
I am copying the insurers' counsel, Ben McCallen, and plaintiffs' counsel on this email.  
I would appreciate your attaching this response to your motion to continue so Judge Montali is aware of the parties' positions.  
Thank you,

Robert Julian  
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On Jul 19, 2019, at 10:14 AM, David Herman <[DHerman@cravath.com](mailto:DHerman@cravath.com)> wrote:

Bob,

As you know, the Debtors filed last night a motion to establish wildfire claims estimation procedures. That estimation motion contemplates, among other things, an evidentiary hearing in the bankruptcy court concerning the Tubbs Fire to begin on October 7, 2019. We think it would be most efficient and appropriate for the estimation motion to be heard at the same time as the motions filed by the TCC and the Ad Hoc Group of Subrogation Claim Holders for relief from the automatic stay, as the motions make competing proposals for how and where to address the likelihood of success of claims related to the Tubbs Fire. The estimation motion is currently set for a hearing on August 14, 2019. Please let us know if you will consent to continue the hearing on the TCC's stay relief motion to that date, or if you will require the Debtors to make a motion seeking such continuance.

Thanks,  
David

David A. Herman  
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